

CITY OF NEW YORK
OFFICE OF ADMINISTRATIVE TRIALS AND HEARINGS
TRIALS DIVISION

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OFFICE OF ADMINISTRATIVE TRIALS AND
HEARINGS

Petitioner,

**DEMAND FOR
DISCOVERY**

- against -

OATH Index No.: 191903
The Honorable ALJ
Noel Garcia

RIZWAN RAJA
Registered Representative

Respondent.

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To Respondent RIZWAN RAJA c/o Dan Ackman, Esq.:

In accordance with the provisions of 48 RCNY Section 1-33, Petitioner demands disclosure and production of materials and information listed below, prior to the expedited trial date of Friday, March 22, 2019:

1. Any and all documents respondent intends to produce into evidence at the above-captioned OATH hearing;
2. A complete list of the names, addresses, and phone numbers of any and all persons who may be called upon to testify in this case;
3. All statements, correspondence, memos, letters, e-mails, made by any of the aforementioned witnesses whether obtained by written, verbal, or electronic means, which pertain to this case and the following TLC summonses and clients:
 - SAIFUL ALAM 72080622A, 71860904A, 71860903A
 - MOHAMMED SIDDIQUEE 10071948C
 - JOSEPH KWAKU ADU RL0012039
 - MD T. HOSSAIN 10116647C
4. A complete print-out from your "ticketing management system" for each individual listed below, including but not limited to, notes, payment and reimbursement information, client affiliation, source of client (pick-up or referral), dates of appearance, outcome for each appearance:
 - SAIFUL ALAM
 - MOHAMMED SIDDIQUEE
 - JOSEPH KWAKU ADU
 - MD T. HOSSAIN

5. A complete print-out from your “ticketing management system” for each summons listed below including but not limited to notes, payment information, client affiliation, source of client (pick-up or referral), dates of appearance, outcome for each appearance :

- 72080622A
- 71860904A
- 71860903A
- 10071948C
- RL0012039
- 10116647C

6. Names of all individuals and organizations that have reading access and/or data input authority and access in your “ticketing management system.”

7. A listing of all databases you utilize in addition to or in conjunction with your “ticketing management system;

8. Identification of all data fields for each of the databases and the ticketing management system itself;

9. A listing of all codes, shorthand, messages, and/or acronyms used in the ticket management system and all other data bases identified;

10. Please provide copies of original entries and the date of those entries in your ticketing management system and any other databases used for the following individuals and summonses;

- SAIFUL ALAM 72080622A, 71860904A, 71860903A
- MOHAMMED SIDDIQUEE 10071948C
- JOSEPH KWAKU ADU RL0012039
- MD T. HOSSAIN 10116647C

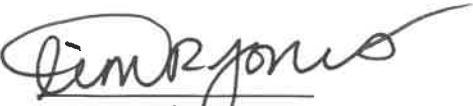
11. In the event that any of the above entries were in any way deleted, altered, updated or annotated after the original date of entry, please provide the dates on which the change to the entries were made as well as copies of the altered, updated, or annotated entries for:

- SAIFUL ALAM 72080622A, 71860904A, 71860903A
- MOHAMMED SIDDIQUEE 10071948C
- JOSEPH KWAKU ADU RL0012039
- MD T. HOSSAIN 10116647C

12. Any and all forms of documentary evidence that you have handled 20, 000 cases since 2010;
13. Time and date-stamped tape request to OATH for Alam appeal, Summons No. 72080622A
14. Any and all documentation from OATH, whether obtained by written, verbal, or electronic means regarding the appeal and/or tape request for the following individual and summonses;
 - SAIFUL ALAM 72080622A
15. Documentary proof of reimbursement to the following individual with respect to the following summons:
 - JOSEPH KWAKU ADU RL0012039
 - MD T. HOSSAIN 10116647C
16. All documents pertaining to the adjudication and/or appeal of the following summonses, including all notices of appearance and all outcome information, including final outcome:
 - SAIFUL ALAM 71860904A, 71860903A
17. Copies of all receipts for payment and or reimbursement given to the following individuals:
 - SAIFUL ALAM
 - MOHAMMED SIDDIQUEE
 - JOSEPH KWAKU ADU
 - MD T. HOSSAIN

Notice is hereby given that failure to produce the above items will result in the pursuit of sanctions in accordance with 48 RCNY Section 1-33(d) (3).

Dated: March 19, 2019



By: Timothy Jones

Attorney for Petitioner

City of New York

Office of Administrative Trials and Hearings

100 Church Street, 12th Floor, New York, NY 10007

(212) 933-3038

OATH Index No. 191903

CITY OF NEW YORK
OFFICE OF ADMINISTRATIVE TRIALS AND
HEARINGS

OFFICE OF ADMINISTRATIVE TRIALS AND
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Petitioner,
- against -

Rizwan Raja

Respondent.

PETITION

By Timothy R. Jones
Attorney for Petitioner
City of New York
Office of Administrative Trials and Hearings
100 Church Street, 12th Floor
New York, NY 10007
(212) 933-3038

Due and timely service is hereby admitted.

New York, N.Y. March 19, 2019
Timothy R. Jones, Esq.
Attorney for Petitioner